Comments in opposition to the NextNav Proposal for Rulemaking / FCC 24-240 / Reconfiguration of 902-928 Mhz

I am opposed to this proposal and urge the FCC to rule against the NextNav proposal in full (as NextNav requests).

I am cutting to the chase at the beginning of my comments. I find it very telling is NetNavs' approach in the text of their proposal in these areas :

1) NextNav mentioned of the ARRL not filing comments in their 2013 proposal is disingenuous at a minimum and more accurately, misleading in their effort to bolster their current proposal.

2) NextNav wants a full approval of this proposal, take it or leave it, in full, not part, not based on comment or fairness.

3) NextNav wants removal of the part 15 interference. It is obvious they know there will be a negative impact if their proposal is approved (in full).

4) NextNav states that coexistence... should be achievable with Part 15 devices and that they are completing technical analysis to address Part 15 usage. They are attempting to brush aside millions of Part 15 devices now, pre-emptively with a dubious, we will understand later. Well later is too late to unwind the damage their proposal will cause.

Background

I live in a rural area where cellular coverage has always been marginal. To hike or travel typically results in the loss of cellular coverage. Most Americans to not appreciate the lack of cellular coverage as coverage is ubiquous in the ubran areas with major population densities. So I have fashioned my mobile life around alternate methods of communication as cellular is not dependable where I live.

My personal example of use of 902-928 low power devices just at my home; 2 weather stations, 13 sensors for temperature readings, lightning detection, water leak, frost detection, 6 LoRa devices for off-gird messaging and sensor linking. At most my devices operate at less than 100 mW or 20dBm. While I my comments could arguably be be discounted due to my isolation from likely

I am an Amateur radio operator and our organization has a 900 DMR repeater located above Tacoma at 4,000 feet ASL. This repeater is part of our 100 repeater network located in the Pacific Northwest. We have over 2,100 members who use this network. It is part of our Emergency Communications network which is in place to be dedicated for emergency communications in time of disaster or other community service or benefit needs. The NextNav proposal will likely interfere with our users ability to hear that repeater in that urban environment. Radio Amateurs are not deep pocket, venture capital funded organizations so over the decades we have lost use of spectrum or limitations on that spectrum. This proposal is another move that will negatively impact hams...BUT not just hams but all low power ISM 902-928 band users and devices.

Our amateur radio club was impacted when we lost 40% of our 220 Mhz band in the 80's when the FCC approved a new service (ACSSB) that UPS proposed. That service failed as did the later allocations by the FCC for other services. But we did not get that have that 2 Mhz of spectrum returned. Once lost, it is likely never to be reallocated back, failed notwithstanding. This proposal enables the same issue again though the RF power is now the issue rather than effective loss of 50% of the lower 900 band. The proposal is worse yet as it enables NextNav to license it's use to other services if their own product/marketing fails, a wonderful windfall or insurance policy to build into their proposal. That will assure the loss of use to millions of current (and furture) users with little ability for ISM users already invested with devices already in place. The 10 fold power differential effectively silences current users LoRa ISM applications.

NextNav is another example of how the interests of non-commercial, civilian and public use of shared resources will transfer to companies who wish to benefit themselves at our expense. If this is proposal is

approved, it is another loss to the citizens of the the United States. If the Commission does grant this proposal, then I request that it be made conditional, a trial period with a sunset provision to return this ISM spectrum to it's former use. At the very least, NextNav should not be able to lease out their spectrum grant to others. If they fail, the rest of the ISM users should not continue to be under the next NexNav-type effort to minimize this ISM spectrum for millions of users and devices.

Respectively summitted,

Mike Shirley, NO7RF